

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CRAIG GOULET,)	
)	
Plaintiff,)	No. 1:04-cv-12577-JLT
)	
vs.)	
)	
NEW PENN MOTOR EXPRESS, INC.,)	<u>UNOPPOSED MOTION FOR LEAVE</u>
et al.)	<u>TO FILE ITS ANSWER OR</u>
)	<u>OTHERWISE PLEAD OF</u>
)	<u>DEFENDANT, NEW PENN MOTOR</u>
Defendants.)	<u>EXPRESS, INC.</u>

Defendant, New Penn Motor Express, Inc., respectfully requests leave until January 30, 2005 within which to file its Answer or otherwise plead to the Complaint.

Defendant, New Penn Motor Express, Inc. makes this request because it is headquartered in Pennsylvania, and it was not able to obtain Boston counsel on this matter until January 4, 2005. Consequently, newly retained counsel needs time to review the factual allegations of the Complaint as well as to discuss the matter with its client.

This motion should not operate to prejudice any of the parties as evidenced by the fact that counsel for New Penn Motor Express, Inc., has contacted Plaintiff's counsel and Plaintiff's counsel has indicated that he does not object to this motion.

For the foregoing reasons, Defendant, New Penn Motor Express, Inc., respectfully requests leave until January 30, 2005 within which to file its Answer or otherwise plead to the Complaint.

Respectfully submitted,
NEW PENN MOTOR EXPRESS, INC.
By its attorneys,

/s/ Nicholas A. Klinefeldt
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Dated: January 7, 2004